

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PARKERVISION, INC.,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Civil Action No. 6:20-cv-00108-ADA

Civil Action No. 6:20-cv-00562-ADA

JOINT MOTION TO AMEND SCHEDULING ORDER

On January 20, 2022, by an email from Mr. Regan Rundio and the agreement of the parties, the Court rescheduled trial in these matters to October 24, 2022 and May 29, 2023. In view of the rescheduled trial dates, Plaintiff ParkerVision Inc. and Defendant Intel Corporation jointly move to modify the schedule up to and including the trials of these matters as follows:

Proposed Deadline	Event 108/562 Cases – First Trial	Event 108/562 Cases – Second Trial ¹
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¹ The parties have agreed and hereby stipulate to the following regarding claims and defenses at the Second Trial. Subject to the Court's rulings on claim narrowing, ParkerVision may assert any claims that have been preserved in its Final Infringement Contentions and expert reports for the Second Trial, provided that any such claim was not invalidated at the First Trial. For any claim that ParkerVision asserted at the First Trial, Intel may present any invalidity theory (e.g., a theory that a particular reference anticipates the claim under § 102, a theory that a particular combination of references renders the claim obvious under § 103, or a theory that a claim term is indefinite, not enabled, or lacks written description under § 112) that has been preserved in its Final Invalidity Contentions and expert reports for the Second Trial, unless that identical theory was presented at the First Trial with respect to that claim and the claim was not determined to be invalid. For any claim that ParkerVision did not assert at the First Trial, Intel may present any invalidity theory preserved in its Final Invalidity Contentions and expert reports for the Second Trial. For the avoidance of doubt, Intel shall not be precluded from offering at the Second Trial any evidence relating to prior independent development and/or the background state of the art, even if similar, or identical evidence was presented at the First Trial.

	Accused cellular products (6,580,902; 9,246,736; 9,118,528; 8,588,725; 9,444,673; and 7,539,474)	Accused Wi-Fi and Bluetooth products (Same patents along with 7,050,508 or 8,190,108, one of which ParkerVision will dismiss with prejudice within 2 weeks of the PTAB's final written decision regarding the '108 patent which will be issued in or about July 2022)
1/17/2022	Deadline to serve Final Infringement Contentions as to the 8,588,725 and 9,444,673 patents. After this date, leave of Court is required for any amendment to Final Infringement Contentions.	
2/14/2022		Deadline to serve Preliminary Invalidity Contentions in response to ParkerVision's Preliminary Infringement Contentions as to Intel's wi-fi/Bluetooth chips for patent nos. 7,050,508 and 8,190,108
2/16/2022	Deadline for the first of two meet and confers to discuss narrowing the number of claims asserted and prior art references at issue. Unless the parties agree to the narrowing, they are ordered to contact the Court's Law Clerk to arrange a teleconference with the Court to resolve the disputed issues.	
2/18/2022	Deadline to serve Final Invalidity Contentions. After this date, leave of Court is required for any	

	amendment to Final Invalidity Contentions.	
3/25/2022	Close of Fact Discovery.	
4/21/2022	Opening Expert Reports.	
4/27/2022		Deadline to serve Final Infringement Contentions. After this date, leave of Court is required for any amendment to Final Infringement Contentions.
5/18/2022		Deadline to serve Final Infringement Contentions. After this date, leave of Court is required for any amendment to Final Infringement Contentions.
5/24/2022	Rebuttal Expert Reports.	
6/17/2022	Close of Expert Discovery.	
6/21/2022	Deadline for the second of two meet and confer to discuss narrowing the number of claims asserted and prior art references at issue to triable limits. To the extent it helps the parties determine these limits, the parties are encouraged to contact the Court's Law Clerk for an estimate of the amount of trial time anticipated per side. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer.	Deadline to serve Final Invalidity Contentions. After this date, leave of Court is required for any amendment to Final Invalidity Contentions.

7/12/2022	Dispositive motion deadline and Daubert motion deadline. See General Issues Note #9 regarding providing copies of the briefing to the Court and the technical adviser (if appointed).	
8/2/2022	Responses to dispositive motions and Daubert motions due. (<i>See</i> Rule CV-7.D.2.)	
8/16/2022	Replies in support of dispositive motions and Daubert motions due. (<i>See</i> Rule CV-7.E.2	
8/25/2022	Serve Pretrial Disclosures (jury instructions, exhibits lists, witness lists, discovery and deposition designations).	
9/8/2022	Serve objections to pretrial disclosures/rebuttal disclosures.	Deadline for the first of two meet and confers to discuss narrowing the number of claims asserted and prior art references at issue. Unless the parties agree to the narrowing, they are ordered to contact the Court's Law Clerk to arrange a teleconference with the Court to resolve the disputed issues.
9/15/2022	Serve objections to rebuttal disclosures and File Motions in Limine.	
9/22/2022	File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibits lists, witness lists, discovery and deposition designations);	

	file oppositions to motions in limine.	
9/30/2022	<p>File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e mail the Court Reporter, Kristie Davis at kmdaviscsr@yahoo.com</p> <p>Deadline to meet and confer regarding remaining objections and disputes on motions in limine.</p>	
10/6/2022	File joint notice identifying remaining objections to pretrial disclosures and disputes on motions in limine.	
10/14/2022	Final Pretrial Conference.	
10/24/2022	Jury Selection/Trial.	
12/9/2022		Close of Fact Discovery
12/23/2022		Opening Expert Reports

1/27/2023		Rebuttal Expert Reports
2/17/2023		Close of Expert Discovery
2/24/2023		Deadline for the second of two meet and confer to discuss narrowing the number of claims asserted and prior art references at issue to triable limits. To the extent it helps the parties determine these limits, the parties are encouraged to contact the Court's Law Clerk for an estimate of the amount of trial time anticipated per side. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer.
3/3/2023		Dispositive motion deadline and Daubert motion deadline. See General Issues Note #9 regarding providing copies of the briefing to the Court and the technical adviser (if appointed).
3/17/2023		Responses to dispositive motions and Daubert motions due. (<i>See</i> Rule CV-7.D.2.)
3/31/2023		Replies in support of dispositive motions and Daubert motions due. (<i>See</i> Rule CV-7.E.2)
4/7/2023		Serve Pretrial Disclosures (jury instructions, exhibits lists, witness lists, discovery and deposition designations)

4/21/2023		Serve objections to pretrial disclosures/rebuttal disclosures.
4/28/2023		Serve objections to rebuttal disclosures and File Motions in Limine.
5/5/2023		File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibits lists, witness lists, discovery and deposition designations); file oppositions to motions in limine.
5/10/2023		File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e mail the Court Reporter, Kristie Davis at kmdaviscsr@yahoo.com Deadline to meet and confer regarding remaining objections and disputes on motions in limine.
5/12/2023		File joint notice identifying remaining objections to pretrial disclosures and disputes on motions in limine.
5/19/2023		Final Pretrial Conference
5/29/2023		Jury Selection/Trial

Dated: February 9, 2022

/s/ J. Stephen Ravel

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Respectfully submitted,

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